

1 Amy F. Sorenson, Esq.  
 2 Nevada Bar No. 12495  
 3 SNELL & WILMER L.L.P.  
 4 15 West South Temple, Suite 1200  
 5 Salt Lake City, UT 84101  
 6 Telephone: (801) 257-1900  
 7 Facsimile: (801) 257-1800  
asorenson@swlaw.com

8 Kelly H. Dove, Esq.  
 9 Nevada Bar No. 10569  
 10 Gil Kahn, Esq.  
 11 Nevada Bar No. 14220  
 12 SNELL & WILMER L.L.P.  
 13 1700 South Pavilion Center Drive, Suite 700  
 14 Las Vegas, NV 89135  
 15 Telephone: (702) 784-5200  
 16 Facsimile: (702) 784-5252  
k dove@swlaw.com  
gkahn@swlaw.com

17 *Attorneys for Defendants Apartment Management  
 18 Consultants, LLC, and Rene Richardson*

19 **UNITED STATES DISTRICT COURT**

20 **DISTRICT OF NEVADA**

21 UNITED STATES OF AMERICA *ex rel.*  
 22 PEGGY THORNTON, Relator,

23 and

24 PEGGY THORNTON,

25 Plaintiff,

26 vs.

27 PORTOLA DEL SOL OPERATOR, LLC, a  
 28 foreign limited-liability company; TMIF II  
 PORTOLA, LLC, a foreign limited-liability  
 company; APARTMENT MANAGEMENT  
 CONSULTANTS, LLC, a foreign limited  
 liability company; and RENE  
 RICHARDSON, as AGENT of PORTOLA  
 DEL SOL OPERATOR, LLC,

29 Defendants.

30 Case No. 2:21-cv-01123-APG-BNW

31 **Stipulation and Order to Extend Deadline  
 32 for Plaintiff Peggy Thornton and  
 33 Defendants Apartment Management  
 34 Consultants, LLC and Rene Richardson to  
 35 Submit Reply to TMIF's Limited  
 36 Opposition to Joint Settlement Motion**

37 **(First Request)**

1           Defendants Apartment Management Consultants, LLC and Rene Richardson (collectively  
2 "AMC"); Plaintiff-Relator Peggy Thornton; and TMIF II Portola, LLC ("TMIF"), by and through  
3 their respective undersigned counsel, hereby stipulate to extend Ms. Thornton and AMC's  
4 deadline to submit a reply in support of their joint motion to approve settlement and distribution  
5 of settlement funds ("Joint Motion") until February 20, 2025, with the following background and  
6 reasons:

7           1.       Ms. Thornton and AMC submitted the Joint Motion (ECF No. 124) on January 8,  
8 2025.

9           2.       As explained in the Joint Motion, Ms. Thornton and AMC have agreed on a  
10 settlement amount to resolve claims against the latter but required Court approval given that the  
11 United States had not stated whether it had any objection to the settlement terms.

12           3.       The United States subsequently filed a partial objection to the Joint Motion, stating  
13 that it does *not* ultimately object to settlement or the settlement amount but requires any  
14 settlement to conform to its specifications, including distribution of settlement funds directly to  
15 the United States. ECF No. 128.

16           4.       The United States, Ms. Thornton, and AMC have since conferred and agreed to  
17 jointly work on a written settlement agreement based on the Government's specifications.

18           5.       Execution of the settlement agreement would result in a stipulation dismissing the  
19 claims against AMC and withdrawal of the Joint Motion.

20           6.       The Government, Ms. Thornton, and AMC therefore stipulated to extend the time  
21 to reply to the Government's limited opposition to provide time to complete the settlement  
22 agreement. ECF Nos. 130.

23           7.       The Court granted that stipulation. ECF No. 131.

24           8.       In the interim, TMIF filed its own limited opposition to the Joint Motion. ECF  
25 No. 133.

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27           ///

28           ///

1           9. TMIF, Ms. Thornton, and AMC thus stipulate to extend Ms. Thornton and AMC's  
 2 time to reply to TMIF's limited opposition to February 20, 2025, to align with Ms. Thornton's  
 3 and AMC's time to reply to the Government's limited opposition.

4           **IT IS SO STIPULATED.**

5           Dated: February 12, 2025.

6           SNELL & WILMER L.L.P.

7  
 8 By: /s/ Gil Kahn  
 9 Amy F. Sorenson, Esq.  
 Nevada Bar No. 12495  
 15 West South Temple, Suite 1200  
 Salt Lake City, UT 84101

10  
 11 Kelly H. Dove, Esq.  
 Nevada Bar No. 10569  
 Gil Kahn  
 Nevada Bar No. 14220  
 1700 South Pavilion Center Drive,  
 Suite 700  
 Las Vegas, NV 89135  
 Telephone: (702) 784-5200

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 15       *Attorneys for Defendant Apartment  
          Management Consultants, LLC and Rene  
          Richardson*

16  
 17 Dated: February 12, 2025.

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 19 NEVADA LEGAL SERVICES

20  
 21 By: /s/ Kristopher Pre  
 22 Kristopher Pre  
 Nevada Bar. No. 14106  
 530 South 6th Street  
 Las Vegas, Nevada 89101

23       *Attorneys for Relator*

24  
 25 Dated: February 12, 2025.

26  
 27  
 28 McDONALD CARANO LLP

29  
 30 By /s/ Rory T. Kay  
 31 Rory T. Kay (NSBN 12416)  
 John A. Fortin (NSBN 15221)  
 32 Karyna M. Armstrong (NSBN 16044)  
 2300 West Sahara Avenue, Suite 1200  
 Las Vegas, Nevada 89102

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 35 Attorneys for Defendant TMIF II Portola, LLC

## ORDER

Good cause appearing, the foregoing stipulation is **GRANTED**. Ms. Thornton and AMC's deadline to submit a reply to TMIF's limited opposition and in support of their joint motion to approve settlement and distribution of settlement funds is extended to and including February 20, 2025.

## IT IS SO ORDERED.

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## CHIEF UNITED STATES DISTRICT JUDGE

February 12, 2025

DATED:

**Snell & Wilmer**  
L.L.P. —  
LAW OFFICES  
1700 South Pavilion Center Drive, Suite  
Las Vegas, Nevada 89135  
702.784.5200

1                   **CERTIFICATE OF SERVICE**

2                   I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen  
 3 (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be  
 4 served a true and correct copy of the foregoing **Stipulation and Order to Extend Deadline for**  
 5 **Plaintiff Peggy Thornton and Defendants Apartment Management Consultants, LLC and**  
 6 **Rene Richardson to submit Reply supporting their Joint Motion to Approve Settlement and**  
 7 **Distribution of Settlement Funds [ECF No. 124]** by method indicated below:

- 8                    **BY FAX:** by transmitting via facsimile the document(s) listed above to the fax  
 9 number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a).  
 A printed transmission record is attached to the file copy of this document(s).
- 10                   **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with  
 11 postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed  
 as set forth below.
- 12                   **BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight  
 13 delivery service company for delivery to the addressee(s) on the next business day.
- 14                   **BY PERSONAL DELIVERY:** by causing personal delivery by, a messenger service  
 15 with which this firm maintains an account, of the document(s) listed above to the  
 person(s) at the address(es) set forth below.
- 16                   **BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for  
 electronic filing and service upon the Court's Service List for the above-referenced case.
- 17                   **BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of  
 18 the individual(s) listed below.

19                  DATED February 12, 2025

21                  \_\_\_\_\_  
 22                  */s/ Tiy Lewis*  
 An employee of SNELL & WILMER L.L.P.

Snell & Wilmer  
L.L.P.  
LAW OFFICES  
1700 South Pavilion Center Drive, Suite 700  
Las Vegas, Nevada 89135  
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